

**From:** [Kratville, David@CDFA](mailto:Kratville.David@CDFA)  
**To:** [Hebert, John](mailto:Hebert.John)  
**Cc:** [Benbow, Gene](mailto:Benbow.Gene)  
**Subject:** RE: Bait Station question for Diphacinone .005% SLN 890020  
**Date:** Thursday, May 09, 2013 4:35:57 PM

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Perfect. Thanks.

David Kratville  
Staff Environmental Scientist  
California Dept. of Food & Agriculture

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**From:** Hebert, John [Hebert.John@epa.gov]  
**Sent:** Thursday, May 09, 2013 1:34 PM  
**To:** Kratville, David@CDFA  
**Cc:** Benbow, Gene  
**Subject:** RE: Bait Station question for Diphacinone .005% SLN 890020

No, I don't think that's necessary. You can simply replace the current label language with the Option B language. That new language will apply to all sites.

John

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**From:** Kratville, David@CDFA [david.kratville@cdfa.ca.gov]  
**Sent:** Thursday, May 09, 2013 3:53 PM  
**To:** Hebert, John  
**Cc:** Benbow, Gene  
**Subject:** RE: Bait Station question for Diphacinone .005% SLN 890020

John,

One last question, hopefully. Would I need to include a definition of sites that might have "zero tolerance" for burrowing rodents or just include option B in the general use directions?

Thanks,

David Kratville  
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**From:** Hebert, John [Hebert.John@epa.gov]  
**Sent:** Thursday, May 09, 2013 12:05 PM  
**To:** Kratville, David@CDFA  
**Cc:** Benbow, Gene  
**Subject:** RE: Bait Station question for Diphacinone .005% SLN 890020

David - Your "option b" is acceptable. You can have CDPR submit a label amendment for that SLN.

Regards,  
John

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**From:** Kratville, David@CDFA [david.kratville@cdfa.ca.gov]

**Sent:** Thursday, May 09, 2013 12:11 PM  
**To:** Hebert, John  
**Subject:** FW: Bait Station question for Diphacinone .005% SLN 890020

John,

Hope your vacation is going well. Not sure if you had a chance to look in to this question yet. When you get back to the office can you please take a look at this section of our diphacinone label requiring the removal of bait once target pests are no longer accepting bait. For these zero tolerance type areas like water control structures would we be able to change the language? As usual I really appreciate your help!

Thanks,

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**From:** Kratville, David@CDFA  
**Sent:** Friday, April 19, 2013 1:56 PM  
**To:** Hebert, John  
**Subject:** Bait Station question for Diphacinone .005% SLN 890020

John,

I have had some requests to look in to the language below for bait station instructions on our Diphacinone labels. The problem is occurring due to the requirement to remove bait once target species are no longer accepting the bait. This proving to be a problem specifically on water control structures, levees, dams, etc. where a zero tolerance policy is needed for burrowing rodents. Any presence of burrowing rodents is not tolerable in these situations therefore having to install and remove stations only when ground squirrels are present is of concern. In addition the amount of bait being applied and consumed may be reduced if used in a more proactive way.

#### **BAIT STATION APPLICATIONS - GENERAL INSTRUCTIONS**

*It may take several days or longer for target animals to become accustomed to a bait station and to begin to accept bait from it. Maintain an uninterrupted supply of bait in the bait stations for as long as target species are taking bait, which often will last form 1 to 4 weeks after feeding begins. Check stations one or more times per week and replace consumed, spoiled or contaminated bait. Properly dispose of bait that is removed from bait stations or is spilled or scattered from bait stations.*

***When toxic bait in bait station is no longer being accepted by target species, remove and dispose of it properly. Bait stations may be removed at the time or left in place if reinfestation is likely. Stations left in place may be baited periodically with nontoxic feed to aid in the detection of target species attempting to recolonize the site and to condition them to feeding in the bait stations. If target rodents return, census baits may be replaced by this product.***

Would something along these lines be acceptable:

*a. When toxic bait feeding by target pests discontinues in bait station and the*

*threat of reinfestation is not imminent or critical (e.g. levees, dams, other water retention structures and for slope stabilization) remove and dispose of bait properly.*

Or

*b. When feeding of toxic bait by target species discontinues and there is not a threat of continued reinvasion remove and dispose of bait from the station properly.*

Is this something we may be able to address? Thanks, hope you have a great weekend and as usual thanks for all your help!

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